

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

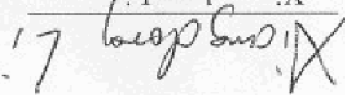
EB-06-36
EC-06-TC-060
Certification of CPNI Filing

Dear Ms. Dortch:

In accordance with the Public Notice issued by the Enforcement Bureau on January 30, 2006, please find attached our company's annual compliance certificate for 2005 as required by Section 64.209(e) of the Commission's Rules, together with a statement describing the company's program to protect Customer Proprietary Network Information.

Sincerely,

China Telecom (USA) Corporation

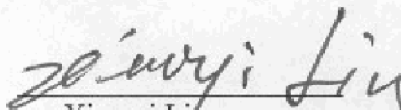
By: 
Xiang-dong Li
Administrative Director

cc: Byron McCoy byron.mccoy@fcc.gov
Best Copy and Printing fcc@bccpiweb.com

**Annual Certificate of Compliance Regarding
Protection of Customer Proprietary Network Information**

The undersigned certifies as follows:

1. I am a corporate officer of China Telecom (USA) Corporation (the "Company").
2. I have personal knowledge that the Company has established and implemented a program to protect customer proprietary network information ("CPNI") as required by Section 64.209 of the Commission's regulations.
3. The program makes the Company's Administrative Director responsible for implementation and approval of all uses of CPNI and establishes:
 - A mechanism for customers to opt-out of receiving marketing information based on their CPNI
 - A record-keeping system to determine the customer's decision regarding use of CPNI, any marketing and sales campaign using CPNI and all instances of when CPNI was disclosed or provided to third parties
 - A disciplinary procedure for improper use of CPNI by employees, agents and contractors
 - A training mechanism to ensure that all employees, agents and contractors are aware of when they can use CPNI in sales and marketing



Xiao-yi Liu
Vice President

Dated: February 6, 2006